

Exhibit D

to Hawkins Declaration

Plaintiffs' Motion for Class Certification

Michel et al. v. Nat'l Collegiate Student Loan Trust 2007-2 et al., No. 18-CV-1781

Bifulco et al. v. Nat'l Collegiate Student Loan Trust 2004-2 et al., No. 18-CV-7692



eRE SETTLEMENT GUIDE

(All settlement offers, even those within blanket authority, must be entered into eRE)

NCO SETTLEMENT GUIDE (EXTERNAL)

2014 Reference Guide

NCO (ANS) accounts only. This guide does not apply to TDM-NAN accounts



CLIENT	CRITERIA		
[REDACTED]	<p>55% on 1st placements (max 6 pays) 50% on 2nd placements (max 24 pays) 40% on 3rd placements (max 24 pays) <i>Settlements are not permitted on Pre-Charge Off (PCO) accounts</i> <u>All below blanket requests must be submitted on the appropriate form to SIF@ncogroup.com</u></p>		
[REDACTED]	<p>70% if C/O < 2 YRS (max 3 pays) 60% if C/O > 2 YRS but < 3 YRS (max 3 pays) 50% if C/O > 3 YRS (max 3 pays) Settlements are based on the charge-off date <i>All settlement percentages are based on the total account balance including accrued interest</i></p>		
[REDACTED]	<p>80% of the total balance</p>		
[REDACTED]	<p>70% of the total balance (Pre-Litigation Settlements) 80% of the total balance (Post-Litigation Settlements) <i>(max 12 pays for all products)</i></p>		
NATIONAL COLLEGIATE TRUST	NATIONAL COLLEGIATE TRUST SETTLEMENT GUIDELINES		Since Charge-Off
			Year 1
	Aggregate		80%
	Minimum: 1 payment		65%
	Minimum: 2-12 payments		80%
	Minimum: 13-24 payments		85%
	We will consider extended payment plan settlement offers beyond 24 payments, but hardship information/documentation must be included		
	The below states have a minimum settlement % of 37% , <i>regardless of charge off date, SOL, or suit status</i>		
	FL, NC, SC & TX		37%
	The below states have separate authority, as described below		
	MI & WI - No Suit		
	SOL expires < 6 mos		27%
	SOL expires < 3 mos		17%

eRE P-Code Listing

P-Code	P-Code Description	Acceptable # of Days	Detail of what to do if you receive this P-Code in Record Type 9	Details of when to send this P-Code in a Record Type 39
*CC:S101	Acknowledgment	2	N/A	Immediately upon loading new business, you must send the acknowledgement P-Code. The acknowledgment must be sent within two business days.
*CC:I150	Pursue Co- Borrower1 (NCT)		Pursue Co- Borrower1 (NCT)	N/A
*CC:I151	Pursue Co- Borrower 2(NCT)		Pursue Co- Borrower 2(NCT)	N/A
*CC:W100	First Demand Letter	2	N/A	Use this P-Code when you send the first demand letter. Every account must receive a first demand letter within two business days of the acknowledgment.
*CC:W101	Second Demand Letter		N/A	Use this P-Code when you send a second collection letter.
*CC:W102	Third Demand Letter		N/A	Use this P-Code when you send a third collection letter.
*CC:W105	Collection Letter Sent		N/A	Use this P-Code when you send additional collection letter's.
*CC:W110	Letter Sent		N/A	You DO NOT need to use this P-Code, if you send it; it will just post a message on eRE and not change the status, unless sending from a Hold or First Demand Status.
*CC:W113	Misc. Debtor Letter		N/A	You DO NOT need to use this P-Code, if you send it; it will just post a message on eRE and not change the status, unless sending from a Hold or First Demand Status.
*CC:W117	Phone Contact	5	N/A	Send this P-Code if you established a phone contact with the debtor.
*CC:W118	Telephone Demand	5	N/A	Used if you make an outbound telephone attempt. First telephone demand must be made within five business days of loading the account.
*CC:W119	Telephone Demand Business		N/A	Used when you make an outbound telephone attempt to the business.
*CC:W120	Telephone Demand Residence	5	N/A	Used when you make an outbound telephone attempt to the residence.
*CC:L600	Suit Balance Verification	2		Use this P-Code to acknowledge the attorney firm has reviewed and validated the account balance. Verification must be completed and reported no greater than 48 hours prior to the suit or judgment package leaving your office. You may not request an affidavit for default before you file suit.
*CC:P110	Suit Filed	30-60	N/A	Send this P-Code when you have filed suit and sent legal documents to the court. Anytime you send this P-Code an accompanying Record 41 must also be sent with all applicable information.
*CC:A051	Suit Filed	30-60	N/A	Send this P-Code when you have filed suite and sent legal documents to the court. Anytime you send this P-Code an accompanying Record 41 must be sent with all applicable information.
*CC:S143	Out For Service		N/A	Send this P-Code when attempting service on summons and complaints/intent to sue (for service first states)
*CC:L116	Summons Served	30-60	N/A	Send this P-Code when a Summons has been served.. Must include Record Type 39.
*CC:L117	Unable to Serve Summons		N/A	Send this P-Code when you have been unable to serve summons and complaint upon the consumer, but are keeping the account open for additional collections and service attempts.
*CC:C142	Close Unable to Obtain Service		N/A	Send this P-Code when you have exhausted service efforts for summons and complaint on the account, and the account is being closed back to NCO.
*CC:D149	Non Wage Attachment Served		N/A	Send this P-Code when you have verified service of a Bank Garnishment
*CC:D148	Wage Attachment Served		N/A	Send this P-Code when you have verified service of a Wage Garnishment
**CC:L128	Bank Information Executed		N/A	Send this P-Code for Bank Information Executed, Also send Record 36 bank garnishment date

eRE P-Code Listing

*CC:P111	Default Judgment Submitted to Court		N/A	Send this P-Code when you have submitted the default judgment to the court. This should be sent after you have submitted the record 41 with suit date and record 36 with service date.
*CC:P112	Motion Summary Judgment Submitted to Court		N/A	Send this P-Code when you have submitted the default judgment to the court. This should be sent after you have submitted the record 41 with suit date and record 36 with service date.
*CC:J100	Judgment	90	N/A	Send this P-Code when a judgment is obtained. Anytime you send this P-Code an accompanying Record 41 must be sent with all application information.
*CC:J101	Judgment Against Garnishee	90	N/A	Send this P-Code when a judgment is obtained and there is some sort of garnishment on the account.
*CC:J102	Judgment No Assets	90	N/A	Send this P-Code when you have obtained judgment but there are no assets found on the debtor.
*CC:I101	Asset Identified on a Judgment	90	N/A	Send this P-Code when you have a judgment on an account but you do not want the account recalled because you know that you have an asset identified and you will act on this asset. You will need to follow-up on this P-Code within 90 days showing you have attached some sort of Legal Lien on the asset to keep the account from being recalled. Please note that most judgments will not be recalled automatically, however, some clients require additional information on their judgment accounts in order for NCO and the Attorney to keep the account. Whenever possible, NCO will notify the Attorney Firm if NCO is initiating the judgment recall for a collection strategy.
*CC:I102	Bank Information Found		N/A	Send this P-Code anytime you verify bank account
*CC:I107	Extension of Time for Asset or Pending Court Date on Judgment Account	90	N/A	Send this P-Code when you have a judgment on an account but you do not want the account recalled because you need an extension of time to find an asset or you have a pending court date. You will need to follow-up on this P-Code within 90 days showing that you have found the asset, attached some sort of Legal Lien on the asset, or send the same P-Code to request an additional extension of time so the account does not get recalled. Please note that most judgments will not be recalled automatically, however, some clients require additional information on their judgment accounts in order for NCO and the Attorney Firm to keep the account open. Whenever possible NCO will notify the Attorney Firm if NCO is initiating the judgment recall for a collection strategy.
*CC:P107	Bank Garn			Send this P-Code when you have a judgment on account and bank garnishment is attached.
*CC:P108	Legal Lien attached on Judgment Account	90	N/A	Send this P-Code when you have a judgment on an account and you have attached a Legal Lien to the account.
*CC:I110	Employment Verified		N/A	Send this P-Code anytime you verify employment
*CC:I111	Real Estate Found		N/A	Send this P-Code any time you find real estate
*CC:I112	Other Asset Found -Vehicle Seizure		N/A	Send this P-Code when you find other assets
*CC:N115	Stipulation			Use this P-Code when signed payment stipulation is received prior to judgment, Must report Record Type 60.
*CC:P107	Employment Executed Date		N/A	Send this P-Code when sending Employee Executed Date; Also send Record 36 wage garnishment date
*CC:P108	Real Estate Executed Date		N/A	Send this P-Code when sending Real Estate executed date; also send Record Type 36 to include lien date.
*CC:P200	Other Asset Found - Vehicle Seizure		N/A	Send this P-Code when you find other assets
*CC:N109	Real Estate Lien Filed			Use this P-Code if have judgment on account and real estate has been attached via Lien completed automatically based on state law or if filed by attorney firm.
*CC:A002	Direct Payment	90	N/A	Send this P-Code when the debtor is paying the Attorney Firm directly and there is a judgment on the account.

eRE P-Code Listing

*CC:A022	Settlement Payment	90	N/A	Send this P-Code when the debtor is paying the Attorney Firm directly and there is a judgment on the account.
*CC:P107	Garnishment	90	N/A	Send this P-Code when the account is being paid through some form of garnishment.
*CC:J106	Collection	30	N/A	Send this P-Code when the debtor has fulfilled PIF/SIF requirements and the Attorney Firm filed a Satisfaction of Judgment.
*CC:A102	Promise to Pay	90	N/A	Send this P-Code when you have a judgment on an account but you do not want the account recalled because you know a payment will be made at some point in the near future. You will need to send this P-Code at least once every 90 days or the account may be recalled even if there is a Judgment. Please note that most judgments will not be recalled automatically, however, some clients require additional information on their Judgment accounts in order for NCO and the Attorney Firm to keep the account open. Whenever possible, NCO will notify the Attorney Firm if NCO is initiating the Judgment recall for a collection strategy.
*CC:A106	Promise to Pay	90	N/A	Send this P-Code when you have a promise to pay on the account.
*CC:A020	Collection	90	N/A	Send this P-Code when you have a confirmed payment on the account and you do not have a judgment on the account.
*CC:I100	Account Sent without Phone #	10	N/A	Send this P-Code if you are not closing the account, and have established that there is a bad home or work phone # on the account. Other forms of collection and litigation should still be utilized.
*CC:I103	Debtor Address is Bad	10	N/A	Use this P-Code if you are not closing the account, and have established there is a bad address on the account. Other forms of collection and litigation should be utilized.
*CC:S106	Dispute			Use this P-Code to report a dispute as defined as any written or verbal communication from the debtor or debtor's representative, which claims to dispute the debt, or any portion thereof, owed to the client. Must include W122-pcode to report description of dispute.
*CC:S144	Dispute Resolved			Use the P-Code to report when a dispute has been resolved.
*CC:L107	Fraud			Use this P-Code to report a Fraud as defined as any written or verbal communication from the debtor or debtor's representative that includes claims of fraud or identity theft.
*CC:S111	Cease and Desist			Use this P-Code to report a Cease and Desist as defined as any written or verbal communication from the debtor or debtor's representative which directs your firm or the client to cease written and/or verbal communication.
*CC:S113	Deceased			Use this P-Code to report deceased debtor with an Estate.
*CC:S114	Deceased			Use this P-Code to report a deceased debtor without an Estate.
*CC:P114	Answer Filed			Use this P-Code if an answer is filed by defendant to Plaintiff's initial court filing. If the answer is a counterclaim the attorney firm must also send the P105 P-code via eRecoverEase in addition to the P114.
*CC:L127	Trial Set			Use this P-Code if a hearing or trial is scheduled.
*CC:S126	Request Affidavit from NCO	14	N/A	Use this P-Code when you are not closing the account and have requested an affidavit of debt on the account.
*CC:S127	Request Statement from Client	10	N/A	Use this P-Code if you are not closing the account and have requested a statement on the account.
*CC:S128	Request Application from Client	10	N/A	Use this P-Code if you are not closing the account and have requested an application on the account.
*CC:S129	Request Media from Client	10	N/A	Use this P-Code if you are not closing the account and have requested some form of media besides a statement or application on the account.
*CC:S145	Request Media from Client			Use this P-Code when a client affidavit has been submitted to the court.

*CC:Z101	Follow up Request for Media / Backup Documentation	10	N/A	Use this P-Code when are submitting a follow up request for media / backup documentation.
*CC:C100	Account Closed	N/A	Close the account on your system immediately upon receipt. If you would like to request the account be re-opened, you would need to contact your liaison. We would need to send you a new placement file in order to do this.	DO NOT use this P-Code unless specifically instructed by NCO. Accounts closed with this P-Code will be deemed collectable and may be subject to future collection efforts.
*CC:C101	Close – Bankrupt	N/A	Close the account as BK on your system.	Use this P-Code when you are closing an account due to Bankruptcy. You should only close accounts as BK if you have a case #. Case # and any other BK information should be sent to NCO as a memo accompanying this P-Code in Record Type 39. Data that must be included in the memo are BK Case #, BK Attorney name, BK Attorney phone #, BK file date, applicable BK Chapter, District and County of court. Account will not be considered for future placement strategies.
*CC:C102	Close – Client Request	N/A	Close the account on your system immediately upon receipt. If you would like to request the account be re-opened, you would need to contact your liaison. We would need to send you a new placement file in order to do this. Since this should only be used when an account is returned to the client, it is unlikely we will be able to forward the account.	DO NOT use this P-Code unless otherwise specifically instructed to do so by NCO. Accounts closed with this P-Code will be deemed collectable and may be subject to future collection efforts.
*CC:C103	Close – Debtor Out of Business	N/A	Close the account on your system immediately upon receipt. If you would like to request the account to be re-opened, you would need to contact your liaison. We would need to send you a new placement file in order to do this.	Send this P-Code when you are closing an account because you have determined the debtor is out of business, and you do not want to continue collecting on this account. Accounts closed with this P-Code will be deemed collectable and may be subject to future collection efforts.
*CC:C104	Close – Deceased	N/A	Close the accounts as deceased on your system.	Use this P-Code when you are closing an account due to deceased. You should only close accounts as deceased if you have a Date of Death. Date of Death and any other pertinent information must be sent over as a memo accompanying this P-Code in Record Type 39. Account will be considered for future placement strategies.
*CC:C105	Close – Efforts Exhausted	N/A	Close the account on your system immediately upon receipt. If you would like to request the account to be re-opened, you would need to contact your liaison. We would need to send you a new placement file in order to do this.	DO NOT use this P-Code unless specifically instructed by NCO to do so. Accounts closed with this P-Code will be deemed collectable and may be subject to future collection efforts. See P-Code C111 below. P-Code C111 will automatically be used after the specified close period to update NCO and the Attorney Firm that the account is officially closed. When reviewing accounts on eRE, accounts closed with this P-Code will mostly be from the automated close process.
*CC:C106	Close – Hardship	N/A	Close the account on your system immediately upon receipt. If you would like to request the account to be re-opened, you would need to contact your liaison. We would need to send you a new placement file in order to do this.	Use this P-Code if you are closing an account because you don't want to proceed with collections, because debtor is claiming hardship and your Attorney Firm cannot secure funds. Please also place any applicable notes accompanying P-Code in Record Type 39. Accounts closed with this P-Code will be deemed collectable and maybe subject to future collection efforts.
*CC:C107	Close – Legal Problem	N/A	Close the account on your system.	Use this P-Code if the account is being closed as disputed, legal, fraud, etc. The account will not be collected on again. Account will not be considered for future placement efforts.
*CC:C108	Close – No Assets	N/A	Close the account on your system immediately upon receipt. If you would like to request the account to be re-opened, you would need to contact your liaison. We would need to send you a new placement file in order to do this.	Use this P-Code if you are closing an account because you are not proceeding with further collection efforts, because you have determined there are no assets on the account. Accounts closed with this P-Code will be deemed collectable and may be subject to future collection efforts.

*CC:C109	Close – Paid in Full	N/A	<p>Close the account on your system immediately upon request. If you would like to request the account to be re-opened, you would need to contact your liaison. We would need to send you a new placement file in order to do this; however, the account is most likely PIF.</p>	<p>This P-Code by itself WILL NOT PIF or SIF the account on the NCO System of Record. Use this P-Code if you have closed the account as a PIF. This will not update the status of the account on eRE, it will not actually PIF the account on the NCO System. If you are updating an account as PIF, you will need to send a Return Code of 3 in the EDI record layout 30 with the final payment for the PIF on the account.</p>
*CC:C110	Close – Reassign for Legal Action	N/A	<p>Close the account on your system immediately upon receipt. If you would like to request the account to be re-opened, you would need to contact your liaison. We would need to send you a new placement file in order to do this.</p>	<p>Use this P-Code if you are closing an account because you do not want to proceed with collections, because your Attorney Firm cannot proceed with legal action, but another firm in your state may be able to. Accounts closed with this P-Code will be deemed collectable and may be subject to future collection efforts.</p>
*CCC111:	Close – Recall Account	N/A	<p>Please see Close Process in SOP. This P-Code is sent to you when NCO is doing a systematic recall process due to non-payment. Accounts are recalled within a specified # of days from receipt of P-Code. You have that time to update the account with a suit, service, judgment, payment or a paying P-Code in order for the account not to be closed. If the appropriate update P-Code is not received within the specified # of days the account will automatically be closed and the Attorney Firm will not receive another update. On eRE, a P-Code of C105 will be sent to NCO and the Attorney Firm, after the specified amount of time to confirm the closure of the account on eRE and NCO System of Record.</p>	<p>Use this P-Code if you are closing an account because you don't want to proceed with collections. Accounts closed with this P-Code will be deemed collectable and may be subject to future collection efforts.</p>
*CC:C112	Closed – Recommended	N/A	<p>Close the account on your system immediately, upon receipt. If you would like to request the account to be re-opened, you would need to contact your liaison. We would need to send you a new placement file in order to do this.</p>	<p>DO NOT use this P-Code unless specifically instructed by NCO. Accounts closed with this P-Code will be deemed collectable and may be subject to future collection efforts.</p>
*CC:C113	Close – Skip	N/A	<p>Close the account on your system immediately upon receipt. If you would like to request the account to be re-opened, you would need to contact your liaison. We would need to send you a new placement file in order to do this.</p>	<p>Use this P-Code if you are closing an account because you do not want to proceed with collections because you have determined the account needs to be skipped and you cannot locate the debtor. Accounts closed with this P-Code will be deemed collectable and may be subject to future collection efforts.</p>
*CC:C114	Close – Statute of Limitations	N/A	<p>Close the account on your system immediately upon receipt. If you would like to request the account to be re-opened, you would need to contact your liaison. We would need to send you a new placement file in order to do this</p>	<p>Use this P-Code when you are closing an account due to it being out of statute. You should only close accounts as out of statute if you have confirmed the account to be out of statute in your state. It is ultimately the Attorney Firm's responsibility to determine an account suit worthy based on statute. However, NCO will provide whenever possible dates of last payment and try to ensure accounts are within statute prior to forwarding. Any other pertinent information should be sent in a memo accompanying this P-Code in Record Type 39. Account will not be considered for future placement strategies in a Legal Strategy.</p>
*CC:C115	Close – Debtor Out of Area	N/A	<p>Close the account on your system immediately upon receipt. If you would like to request the account to be re-opened, you would need to contact your liaison. We would need to send you a new placement file in order to do this</p>	<p>Use this P-Code if you are closing an account because you do not want to proceed with collections, because the debtor has moved out of the area in which you cannot proceed with collections or litigations (i.e., out of state). Accounts closed with this P-Code will be deemed collectable and may be subject to future collection efforts.</p>

*CC:C125	Close – Dismissed with Prejudice		Close the account on your system immediately upon receipt. Please note that in these instances NCO should be notified separately of any cases dismissed with prejudice	Send this P-Code when you are closing the account and the account was dismissed with prejudice – not still collectable.
*CC:C126	Close – Dismissed without Prejudice		Close the account on your system immediately upon receipt.	Send this P-Code when you are closing the account and the account was dismissed without prejudice.
*CC:CS02	Close – Placement Rejected	N/A	Close the account on your system immediately upon receipt. If you would like to request the account to be re-opened, you would need to contact your liaison. We would need to send you a new placement file in order to do this	Use this P-Code if you are closing an account because you do not want to accept the placement of the account (conflict of interest). Please be aware that if an account was closed with you on eRE or the NCO System, in order to re-forward an account we will need to re-forward the entire account as a new placement, so DO NOT use this P-Code if you are receiving an account under these circumstances. Accounts closed with this P-Code will be deemed collectable and may be subject to future collection efforts.
*CC:A100	Close – Paid in Full	N/A	Close the account on your system immediately upon receipt. If you would like to request the account to be re-opened, you would need to contact your liaison. We would need to send you a new placement file in order to do this, however, the account is most likely PIF.	<u>This P-Code by itself WILL NOT PIF the account on the NCO System of Record. Use this P-Code if you have closed the account as PIF. This will only update the status of the account on eRE, it will not actually PIF the account on the NCO System. If you are updating an account as a PIF, you would need to send a Return Code of 3 in the EDI record layout 30 with the final payment for the PIF on the account. Accounts should be closed within 3 days of the final payment posting.</u>
*CC:A101	Close – Settled in Full (SIF)	N/A	Close the account on your system immediately upon receipt. If you would like to request the account to be re-opened, you would need to contact your liaison. We would need to send you a new placement file in order to do this; however, the account is most likely SIF.	<u>This P-Code by itself WILL NOT SIF the account on the NCO System of Record. Use the P-Code if you have closed the account as SIF. This will not update the status of the account on eRE, and it will not actually SIF the account on the NCO System. If you are updating an account as SIF you would need to send a Return Code of 3 in the EDI record layout 30 with the final payment for the SIF on the account. Accounts should be closed within 3 days of the final payment posting.</u>
*CC:J106	Close – Judgment Satisfied	N/A	Close the account on your system immediately upon receipt. If you would like to request the account to be re-opened, you would need to contact your liaison. We would need to send you a new placement file in order to do this.	Use this P-Code to report firm has submitted the Satisfaction of Judgment to the courts when an account has been Settled or Paid in Full.
*CC:W122	General Info	N/A	These are notes that NCO would send to you, you should post them to your collection screen notes for collectors to review.	If you send a Record Type 39 with no P-Code or with a W122 P-Code, the messages in the Record Type 39 will post as a memo to eRE and get transferred through to the NCO System. All collection notes that do not fall under one of the above P-Codes should be sent through to eRE so that eRE messages should include all of the information that is on your collection system.
*CC:B101	BK Reaffirmation	N/A	N/A	Certain clients will allow Bankruptcy Reaffirmation (Ex Resurgent). If this is allowed then send this P-Code to indicate the Bankruptcy Reaffirmation was filed with the court. Please note this action will close the accounts for certain clients as A NL, so ensure that you conduct BK Reaffirmations prior to initiating.
*CC:	Assigned with firm but No Status	N/A	You should not receive this and would only apply to legacy NCO Attorney Firms prior to 2002. This is a status on eRE that means the account was forwarded to your firm prior to NCO converting the account on eRE. You should send a P-Code on any accounts in Unknown Status so that the correct work flow group is represented.	N/A
*CC:CS01	Close – Duplicate Placement	N/A	Close the account on your system immediately upon receipt. If you would like to request the account to be re-opened, you would need to contact your liaison. We would need to send you a new placement file in order to do this.	DO NOT use this P-Code. Please be aware that if an account was closed with you on eRE or the NCO System, in order to re-forward an account we will need to re-forward the entire account as a new placement, so DO NOT use this P-Code if you are receiving an account under these circumstances. Also, note that there is no Work Flow Group for this P-Code this means this does not change the status of the account or actually close the account on eRE or with NCO.